

Docket No. RM01-5-000 Electronic Tariff Filings

Frequently Asked Questions and Answers:

The FERC staff disclaimer: The Commission staff provides informal advice and assistance to the general public and to prospective applicants. Opinions expressed by staff do not represent the official views of the Commission, but are designed to aid the public and facilitate the accomplishment of the Commission's functions. (Sec. 388.104(a) of the Commission rules and regulations.)

Existing guides:

A guide on how to install the FERC eTariff Field software:

<http://www.ferc.gov/docs-filing/etariff/install-guide.pdf>

A draft guide for starting the baseline creation process:

<http://www.ferc.gov/docs-filing/etariff/baseline-tariff-guide.pdf>

A guide on the proper format to use to import tariffs into eTariff, and ideas on how to write a tariff extraction program to automate the tariff conversion process:

<http://www.ferc.gov/docs-filing/etariff/conversion-guide.pdf>

Draft instructions on how to format electronic files and documents attached to an electronic tariff filing:

<http://www.ferc.gov/docs-filing/etariff/electronic-manual.pdf>

Software Related Questions:

Q. Will the Field eTariff software be enhanced to convert existing tariff documents in an unlimited number of software and organizational formats into the section based format?

A. No. Existing documents are maintained by companies in a wide range of software formats, and most tariff documents have unique organizational structures. It took human intelligence to create each document that software techniques cannot be expected to duplicate.

Word and WordPerfect have excellent search/replace and keyboard macro capabilities which facilitate the standardization process. For example, gas tariff from FASTR often contain <CR>+8 spaces. A simple Find/Replace can eliminate those no-longer necessary formatting and permit text wrapping.

Q. Can I use macros to copy text documents and paste copied material into the eTariff software?

A. A qualified “Yes,” as information must be passed between two software packages involved. Even though most companies use Word as their text processor and eTariff is based on Microsoft technology, Visual Basic cannot be used to create a macro to copy text and pass the information over to eTariff.

There are two ways to get around this problem. First, create a structured set of data utilizing a document format specific extraction application, and import that data into eTariff utilizing the <File><MS Word Interface Import> feature. Additional assistance and examples for Word and Excel based tariff are located at <http://www.ferc.gov/docs-filing/etariff/conversion-guide.pdf> . This option is good for converting large amounts of tariffs (over 300 or 400 pages).

Second, there are other products such as Workspace Macro Pro (<http://www.tethyssolutions.com/macro-automation.htm>) that will work in Word and eTariff environments. Use your text processor’s macro capabilities to copy material into Notepad. Use the third party software to launch the text processor copying macro, change focus to eTariff-Field, send keyboard commands to create and paste material into tariff sections, and return to the text processor. The macro can be as elaborate as the designers wish. This option is good for tariff conversions of 200-500 pages.

Either of these options will likely be document specific. The resulting tariff will likely require manual editing to relocate sections, apply proper section titles, and input alternative section numbering.

Q. The software installed, but there is no communication with FERC. What is wrong?

A. Every company has established their own standards and means of communicating electronically outside their own systems. If you are having communication problems, you should find out if anyone at your company currently use the FERC’s Form 1, 2, 6, 423, or EQR system. If you do, go to your desk or otherwise find out what communication settings are being used in those system. Duplicate them in the ETariff system as a starting point. This may not help in cases where the ETariff people are geographically separated from their Form “x” people - the different sites may have different set ups. But it's something that is quick and easy check. And if they've got a somewhat standard IT policy, it will probably solve their communication problems.

Q. Who are the testing companies?

A. These are the ones that volunteered (or were volunteered by their associations) as of November 19, 2004:

Electric - Arizona Public Service

Electric - MISO

Electric - SCE

Electric - Westar Resources

Electric and Gas - Duke Energy

Gas - NiSource

Gas - Northern Natural

Gas - Williams

Gas/311 – DTE Energy

Oil - Buckeye Pipe Line Company

Oil - Shell Pipeline Company

Oil – BP Pipeline Company

Q. Are more volunteer testing companies needed?

A. Since the issuance of NOPR, several other companies have volunteered. Given the limited number of OMTR staff assigned to the task of testing, and the level of the expected dialog as they work with each other to test the software, we will consider adding or replacing testing companies on a case-by-case basis.

Q. I am an agent that often makes tariff filings on behalf of clients. Will I continue to be able to make filings on behalf of my client?

A. Yes. Anyone may download the Field eTariff software from the Commission's web site. For the purposes of this prototype testing period, all companies requesting a download are required to register and obtain a PIN number. This PIN number will be required to actually make tariff filings that will modify the eTariff data base on the FERC server. If your company does not consistently represent a particular regulated company with a tariff, request a generic company registration that will permit you to submit practice filings to the Commission's test site.

Q. How many sections can I have per level of tariff?

A. At the moment 9,999.

Q. How many "pages" can I have per section?

A. We have tested over 150 pages of mixed text and charts in a single section without problems.

Q. The software permits a company to have more than one tariff. What are the pros and cons of this functionality?

A. Staff recommends that most regulated companies establish only one tariff. The tariff filing part of this software assumes that regulated entities will file to revise only one tariff at a time. This basically follows the current structure of tariff filings, wherein a proposed change must be accompanied by all the proposed changed tariff sheets. Thus, in concept, a single tariff can be viewed as all the terms, conditions, services and rates linked by a lowest common denominator within the tariff. What could be that lowest common denominator? An example, in the gas industry, would be Volume Nos. 1 and 2 are usually linked by their rate design. When a pipeline with both Volumes files a new general rate case, they usually propose to change the rates for services in both Volumes Nos. 1 and 2. Under this proposed software, the most efficient way to manage the tariffs and rate filings would be to make Volume Nos. 1 and 2 a single “tariff.”

Multiple tariffs are useful for companies with several operating divisions that are restricted from communicating with each other. For example, some public utilities have a transmission division and an energy marketing division. Communication between these divisions is limited by Order No. 2004. Access by one division to the working tariff revision data base of another division could compromise efforts by the company to minimize unauthorized information flow. These companies can establish different tariffs that are the responsibility of different divisions, and maintain each tariff separately on separate machines and servers.

Q. Where do I report software problems?

A. First check available resources to ensure that the problem hasn't been addressed elsewhere – including the guides available at <http://www.ferc.gov/docs-filing/etariff.asp>. If working with an OMTR tester, discuss the problem with him/her. If not one of the testing companies, submit the problem to etariff@ferc.gov with a copy of the FERC log file. Staff will attempt to respond as time permits.

Q. How do I make suggestions to improve the software?

A. If working with an OMTR tester, discuss the idea with him/her. If not one of the testing companies, submit the suggestion to etariff@ferc.gov with an explanation on the benefits of the enhancement, idea of how to implement it, and any other support for the idea.

Q. I have a tariff or a section of a tariff that is almost the same as another company's. Can I copy that tariff or tariff section to reduce conversion effort?

A. Yes. All tariffs are public for both the test period and, if the Commission adopts this software, when it becomes live. Companies are encouraged to identify shared tariffs and discuss with counter-parties who will do the conversion. This cooperation will reduce conversion time and effort.

Q. I have an old tariff/rate schedule/service agreement that has not changed in years. Must it be broken up into sections?

A. The Commission asked in the NOPR what is the appropriate level of granularity. Staff notes that once a tariff has been converted and put into the eTariff system, it is easy to add sections in the future if required. Staff suggests, for the interim and pending further Commission guidance, companies use their experience to decide whether a tariff that has not changed much in the past and is not likely to change much in the future requires much in the way of sections. Staff suggests possibly minimal number of sections: a rate section, all other terms and conditions of service, receipt/delivery points and appendices.

Active tariffs such as OATTs and Volume No. 1s should have a small level of granularity.

Q. My company has specific internal procedures that have been in place for years. Will eTariff be enhanced to accommodate my company's procedures?

A. Approximately 2,000 companies file tariffs with the Commission. Internal company procedures are usually company specific, and have evolved taking into consideration company specific issues, such as internal hardware and software, third party software, corporate structure, corporate division of authorities, individual job assignments and capabilities, differing regulatory and customer obligations, etc. It is not likely eTariff can accommodate all existing companies' internal procedures.

Electric (Public Utilities and Power Authorities) related questions:

Q. I am a public utility company. What is the importance of Order No. 614 as discussed in the NOPR? ¹

A. Order No. 614 introduced several concepts to public utility tariffs maintenance. First: supersession. This is the concept that tariff language that is no longer effective must be removed from the effective tariff. Second: a tariff should only identify any applicable rate or charge for a service, and include all terms and conditions associated with the service, and address only FERC jurisdictional services. Further, the Commission has also found public utility tariffs often contain extraneous material, such as supporting documentation best left as part of the tariff filing, and not part of the actual tariff.² Staff is of the

¹ Designation of Electric Rate Schedule Sheets, Order No. 614, 65 FR 18221, FERC Stats. & Regs., ¶ 31,096 (2000).

² *E.g.*, Boston Edison Company, 98 FERC ¶ 61,292 (2002).

opinion that many public utility paper rate schedules and service agreements could be significantly reduced in size if refiled consistent with Order No. 614 standards. Taking advantage of the guidelines provided by Order No. 614 can significantly reduce the burden of converting paper tariffs into an electronic format.

Q. I am a public utility company. What is the importance of Order No. 2001 as discussed in the NOPR? ³

A. Order No. 2001 permitted public utilities to maintain conforming service agreements solely through the Electric Quarterly Report (EQR). Public utilities were offered the opportunity to report conforming service agreements to the Commission, and the Commission removed those service agreements from the public utility tariffs. The Commission also suggested that public utilities could review their tariffs to find filed contracts that were basically identical and convert them to conforming service agreements with the filing of a standard form of agreement reportable only under the EQR. However, the Commission also stated that if public utilities choose not to report the conforming service agreements in their tariff for removal, they were required to maintain those agreements in the traditional paper format.⁴ Staff is aware that several dozen public utilities filed reports of conforming service agreements, and a handful of public utilities have filed for Commission approval new standard forms of agreement for the purpose of converting bilateral agreements into conforming agreements reportable solely on the EQR. The NOPR suggests public utilities should re-examine their tariffs again to determine if additional conforming agreements can be removed from the paper tariffs, or if groups of identical bilateral agreements exist that could be converted into conforming agreements through the filing of a standard form of agreement, for the purpose of further reducing the paper tariff. Taking advantage of the guidelines provided by Order No. 2001 can significantly reduce the burden of converting paper tariffs into an electronic format.

Q. My OATT is largely the same as that required by Order No. 888. Can I copy another utility's OATT to reduce conversion time?

A. Yes. Further, OMTR Staff has loaded under the company name FERC Pro Forma OATT the OATT, as updated by various Commission orders. All utilities are encouraged to copy either this tariff or others to reduce conversion time and effort.

³ Revised Public Utility Filing Requirements, Order No. 2001, 67 FR 31043, (May 8, 2002), FERC Stats. & Regs., ¶ 31,127 (2002).

⁴ Revised Public Utility Filing Requirements, Order No. 2001-C, 101 FERC ¶ 61,314 (2002).

Oil Pipeline Related Questions:

Q. I am an oil pipeline. The NOPR redefines the term of “tariff” as it applies to oil pipelines. If I make a “tariff” filing, will all sections of the tariff, both those in effect and those that are the subject of the tariff filing, subject to protest and suspension?

A. Only the requested changed sections are subject to suspension. All other aspects of the tariff, whether in that schedule or any other schedule under the tariff, remain unchanged and effective, and are not subject to suspension.

Q. Currently effective oil tariffs are strictly formatted with borders and other special formats. Can these formats be converted into eTariff?

A. For most page formatting: No. For most text formatting: Yes. Therefore, page borders, lines, headers and footers will be lost and cannot be reproduced. But text formats, such as font, point size, color, some alignment, and other features can be retained.

Gas Pipeline (NGA and NGPA) related questions:

Q. Are NGPA gas pipelines’ conditions of service and rate filings encompassed by this NOPR?

A. Yes. Conditions of service are proposed to be required to be filed and maintained by the FERC’s eTariff data base.

Q. Are NGA pipelines’ Volume No. 2 encompassed by this NOPR?

A. Yes.